

Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

CHRISTIE BOWERS,  
Plaintiff,  
vs.  
ROBIN KLETKE and ROBIN COHEN,  
husband and wife and the marital community  
composed thereof,  
Defendants.

NO. C08-1768RSM

**DECLARATION OF GREGORY J.  
MURPHY IN SUPPORT OF  
DEFENDANTS' MOTION TO COMPEL**

**NOTE ON MOTION DOCKET:  
MAY 22, 2009**

Gregory J. Murphy declares as follows:

1. I am the attorney of record for the Defendants in this action, have personal knowledge of the facts contained herein, and I am competent to testify thereto.
2. Attached hereto as Exhibit A is a true and correct copy of the first page and the declaration of service of the Defendants' First Set of Interrogatories and Requests for Production to Plaintiff.
3. Attached hereto as Exhibit B is a true and correct copy of the first page and the declaration of service of the Defendants' Second Set of Interrogatories and Requests for Production.
4. Attached hereto as Exhibit C is a true and correct copy of my March 14, 2009 email to Gregory P. Cavagnaro.

DECLARATION OF GREGORY J. MURPHY IN SUPPORT OF  
DEFENDANTS' MOTION TO COMPEL - Page 1 of 3

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**LAW OFFICES OF GREGORY J. MURPHY, P.S.**

PO Box 1298  
621 Pacific Avenue, Suite 15  
TACOMA, WASHINGTON 98402-1298  
PHONE 253-572-3688  
FAX 253-572-9588

5. Attached hereto as Exhibit D is a true and correct copy of an email exchange between me and Mr. Cavagnaro beginning on April 13 – April 17, 2009.

6. Attached hereto as Exhibit E is a true and correct copy of my April 21, 2009 letter to Mr. Cavagnaro.

7. Attached hereto as Exhibit F is a true and correct copy of my April 29, 2009 email to Mr. Cavagnaro.

8. Attached hereto as Exhibit G is a true and correct copy of my May 4, 2009 email to Mr. Cavagnaro.

I declare under penalty of perjury that the foregoing is true and correct.

DATED this 6<sup>th</sup> day of May, 2009.

By:

Gregory J. Murphy, WSBA No. 16184

gmurphy@murphy-legal.com

Attorney for Defendants

**CERTIFICATE OF SERVICE**

I, Lelani Mertens, hereby certify that on May 6th, 2009, I electronically filed the foregoing **Declaration of Gregory J. Murphy in Support of Defendants' Motion to Compel Answers and Responses to First and Second Discovery Requests** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the person(s) listed below:

Gregory P. Cavagnaro  
Law Offices of Gregory Cavagnaro  
1400 112th Avenue SE #100  
Bellevue WA 98004  
[greg@gcavlaw.com](mailto:greg@gcavlaw.com)

I certify under penalty of perjury, under the laws of the State of Washington, that the foregoing is true and correct.

DATED this 6<sup>th</sup> day of May, 2009 at Tacoma, Washington.

  
\_\_\_\_\_  
Lelani Mertens